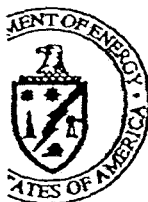


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Department of Energy

ROCKY FLATS FIELD OFFICE
P.O. BOX 928
GOLDEN, COLORADO 80402-0928

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DIST.	LTR	ENC
SUSSEN, S.J.		
BENBERGER, V.		
MOLINI, A.M.		
ULSFORD, M.D.		
DGE, L.		
D, R.G.		
SGROVE, M.M.		
K, C.M.		
WFOOD, A.C.		
KONG, V.J.		
BY, S.		
TERLE, S.E.		
IRERA, D.W.		
IRERA, K.P.		
TON, J.C.		
MAIN, A.L.		
DING, W.A.		
ROUN, W.P.		
DAHL, T.G.		
L, J.A.		
NARD, R.C.		
VS, M.R.		
RTINEZ, L.A.		
RTH, K.		
KER, A.M.		
LIPS, F.J.	X	X
STON, S.		
DGERS, A.D.		
ELTON, D.C.		
DR, N.R.		
ORHEIS, G.M.		
Futing, J.	X	X

R. CONTROL	X	X
MIN. RECORD		
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reviewed for Addressee
Corres. Control RFP

2/17/99 By *[Signature]*

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DE ORDER # 54-01

1/4

Mr. Steve Gunderson
Rocky Flats Cleanup Agreement Project Coordinator
Hazardous Materials and Waste Management Division
Colorado Department of Public Health and Environment
4300 Cherry Creek Drive South
Denver, Colorado 80222-1530

Dear Mr. Gunderson:

In accordance with the Rocky Flats Cleanup Agreement, Part 10 Changes to Work, Paragraph 127, DOE is notifying the Colorado Department of Public Health and Environment (CDPHE) of its intent to make minor modification to work being done pursuant to the Decommissioning Operations Plan (DOP) for the Building 779 Cluster Interim Measure/Interim Remedial Action, here after referred to as the 779 DOP. These modifications are made to correct errors and omissions.

The changes as identified in this letter are minor in nature and do not represent a major modification to the 779 DOP. The first modification applies to the statement "Any residuals from size-reduction or radioactive decontamination will carry the same Environmental Protection Agency (EPA) waste codes as the unit being treated," Section 9.1.2, RCRA Closure Description Document, Option #1. The aforementioned units were permitted to store hazardous waste carrying specific EPA codes identified in Table 9-1. However, process knowledge clearly shows these gloveboxes in Unit 90.43 do not meet the definition of corrosiveness (D002), reactivity (D003), or ignitability (F003).

The second modification will also amend Section 9.0. This modification will delete Gloveboxes NC-7 and 106-6 from Table 9-1. These gloveboxes were never used to store hazardous waste; therefore the closure standards do not apply.

The third modification omits the statement, "Quarterly inspections were instituted to verify this continued condition," of Part 9.1.1. After all of the waste was removed from these units, inspections were ceased and have not been re-instituted. The aforementioned units have been maintained in a "RCRA Stable" condition since March 12, 1997 (Units 90.37 and 90.39), and April 2, 1997 (Unit 90.43). This condition has been discussed between J. K. Wrapp (Kaiser-Hill) and Chris Gilbreath (CDPHE).

ADMIN RECORD

B779-A-000200

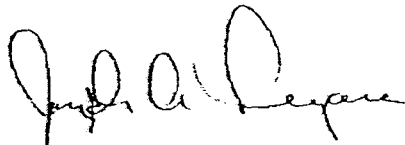
Steve Gunderson
99-DOE-01772

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On August 25, 1998, both agreed that inspections are not required for areas that do not contain hazardous waste, and that the 779 DOP should be modified to omit this requirement. Attached is a revised Table 9-1 (PGC-002) and a revised page 81.

Questions regarding this letter can be directed to David Nickless at (303) 966-5221.

Sincerely,



Joseph A. Legare
Assistant Manager
for Environment and Infrastructure

Enclosure

cc w/Enc:

E. Kray, CDPHE

J. Whiting, K-H

Administrative Record

2



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ATTACHMENT #1

The changes as identified in this letter are minor in nature and do not represent a major modification to the 779 DOP. The proposed minor modifications are:

1. Section 9.0 Regulatory and Environmental Considerations, Table 9-1: Decommissioning the 779 Cluster.

Unit #	Building	Unit Name	Equipment	Waste Codes	Unit Description	Volume	Waste Description
90.37	779	Room 131 Gloveboxes	Container Storage Gloveboxes	D004,D005,D006 D007,D008,D009 D010,D011.	90.37 consists of four gloveboxes in Bldg.779 and is used for container storage. The gloveboxes are 131A, 131B, 131D, and 131E.	Liquid capacity 12 gallons each.	Solid and liquid mixed residues, TRU mixed waste, and low-level mixed waste.
90.39	779	Room 137 Gloveboxes	Container Storage Gloveboxes	D004,D005,D006 D007,D008,D009 D010, D011, F001 Note: Gloveboxes 106-2,106-6,NC-7 and H106-1 did not store listed waste. Gloveboxes 106-1, 106-3,106-4,106-5 and H106-2 did store F001 wastes.	Unit 90.39 consists of six gloveboxes, and two hoods in Bldg.779 and is used for container storage. They are gloveboxes 106-3,106-4, and 106-5, 106-1,106-2, hoods H106-1 and H106-2.	Liquid capacity 8 gallons each	Solid and liquid mixed residues, TRU mixed waste, and low-level waste.
90.43	779	Room 160 Glovebox	Container Storage Glovebox	D004,D005 D006,D007,D008 D009,D010,D011 F001,F002, and F005	Unit 90.43 is a glovebox in Bldg.779 and is used for container storage. Glovebox 860 stored low-level waste	Liquid capacity 17 gallons	Solid and liquid mixed residues, TRU mixed waste and low-level mixed waste.

Since these units did not meet RCRA closure standards in accordance with Part X of the RFETS RCRA permit, the following actions were taken to bring these units into RCRA compliance:

- All RCRA regulated waste was removed from these units;
- The units were rendered RCRA Stable as defined in the Site RCRA permit;
- DOE sent the State a request for deferral from the RCRA closure requirements until decontamination and decommissioning of Building 779 commences.